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February 3, 2025

By ECF Filing and Electronic Mail

Hon. Donovan W. Frank
United States District Court for the District of Minnesota
Warren E. Burger Federal Building and U.S. Courthouse
316 North Robert Street, Suite 100
St. Paul, MN 55101
frank_chambers@mnd.uscourts.gov

Re: *In re: Change Healthcare, Inc. Customer Data Sec. Breach Litig.*, 0:24-md-03108-DWF-DJF, Coordination with Related State Court Proceedings

Dear Judge Frank:

Pursuant to the Court's request during the Status Conference held on December 16, 2024 for updates concerning the state court cases related to this MDL, Defendants Change Healthcare Inc. ("Change Healthcare"), UnitedHealth Group Incorporated, UnitedHealthcare, Inc., Optum, Inc., and Change Healthcare Solutions, LLC (collectively, "Defendants") write to update the previously-provided list of pending state court cases stemming from the February 2024 cyberattack on Change Healthcare. Attached hereto as Appendix A is a chart of all pending state court cases related to this MDL that Defendants are aware of at this time. Defendants have also provided a brief status of each matter in Appendix A.

In addition, there are a number of cases, detailed below, for which Defendants request additional support from the MDL Court, in order to achieve the greatest coordination possible with the MDL.

1. *Mid-South Imaging & Therapeutics, P.A. v. UnitedHealth Group, Inc., et al.*, No. 24-0723-III (Tenn. Ch. Ct. Davidson Cnty. filed June 21, 2024)

Status: The court denied Defendants' motion to stay but ordered that discovery should be coordinated with the MDL. On January 20, 2025, Defendants served responses to Mid-South's first set of discovery requests. Defendants respectfully request that the MDL Court continue to communicate with the Honorable Chancellor l'Aesha Myles to coordinate discovery in this case.

<p><u>Chancellor:</u> Hon. l'Aesha L. Myles 1 Public Square, Suite 407 Nashville, TN 37201 Phone: (615) 862-5705 Fax: (423) 272-6233</p>	<p><u>Plaintiff's Counsel:</u> Kathryn Hannen Walker, Esq. Briana T. Sprick Schuster, Esq. Taylor M. Sample, Esq. Bass Berry & Sims PC 150 Third Avenue South, Suite 2800</p>
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	Nashville, TN 37201 Phone: (615) 742-6200 kwalker@bassberry.com briana.sprick.schuster@bassberry.com taylor.sample@bassberry.com
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2. *PruittHealth Inc. v. Change Healthcare, Inc.*, No. 25C149 (Tenn. Cir. Ct. Davidson Cnty., filed January 17, 2025)
Time for a Change Therapy LLC v. Change Healthcare, Inc., No. 25C151 (Tenn. Cir. Ct. Davidson Cnty., filed January 17, 2025)
Total Wound Care of Oklahoma LLC, et al. v. Change Healthcare, Inc., No. 25C155 (Tenn. Cir. Ct. Davidson Cnty., filed January 17, 2025)

Status: Defendant Change Healthcare was served with the complaints in *PruittHealth* and *Time for a Change Therapy* on January 17, 2025, and a response is currently due on February 18, 2025. Defendant Change Healthcare was served with the complaint in *Total Wound Care* on January 21 and a response is currently due on February 20, 2025. The plaintiffs in these cases are represented by Stranch, Jennings & Garvey, PLLC, a law firm representing plaintiffs in 18 cases that have been tagged and transferred to the MDL. Those cases transferred to the MDL are nearly identical in these three new state court cases. Defendant Change Healthcare respectfully requests that the MDL Court contact the Honorable Judge Lynne Tyler Ingram to coordinate these matters with the MDL proceedings.

<u>Judge:</u> Hon. Lynne Tyler Ingram Metro Courthouse 1 Public Square Nashville, TN 37201 Tel: (615) 880-2591 Jud. Assistant: tammylrutledge@jnsnashville.gov	<u>Plaintiff's Counsel:</u> J. Gerard Stranch, IV Grayson Wells Miles M. Schiller Stranch, Jennings & Garvey, PLLC 223 Rosa L. Parks Avenue, Suite 200 Nashville, TN 37203 Tel. (615) 254-8801 gstranch@stranchlaw.com gwells@stranchlaw.com mschiller@stranchlaw.com
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3. *Teed v. Change Healthcare Inc., et al.*, No. 24CL015029C (Cal. Super. Ct. San Diego Cnty., filed October 4, 2024)
Golden v. Change Healthcare Inc., et al., No. 24CL015029C (Cal. Super. Ct. San Diego Cnty., filed October 4, 2024)

Status: Change Healthcare filed motions to stay in *Teed* and *Golden* on December 3, 2024. A hearing on the motions to stay is set for February 14, 2025. Defendant Change Healthcare respectfully

requests that the MDL Court continue to communicate with the Honorable Judge Judy S. Bae to coordinate these cases with the MDL proceedings.

<u>Judge:</u> Hon. Judy S. Bae Central Civil Division – Hall of Justice 330 West Broadway, San Diego, CA 92101 Phone: (619) 450-7062	<u>Plaintiff's Counsel:</u> Jeremy S. Golden Cory M. Teed Golden & Cardona-Loya, LLP 3130 Bonita Road, Suite 200B Chula Vista, CA 91910 Phone: (619) 476-0030 Fax: (775) 989-5471 jeremy@goldencardona.com cory@goldencardona.com
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4. *Fay v. Change Healthcare Inc., et. al.*, No. 25CL000431N (Cal. Super. Ct. San Diego Cnty., filed January 6, 2025)

Status: Defendant Change Healthcare accepted service of this newly filed case on January 17, 2025. The plaintiff in this case is represented by Golden & Cardona-Loya, LLP, the same law firm representing the plaintiffs in *Teed* and *Golden*, and the claims brought are nearly identical in all three cases. Defendant Change Healthcare respectfully requests that the MDL Court contact the Honorable Judge Washington to coordinate this matter with the MDL proceedings.

<u>Judge:</u> Hon. Michael D. Washington Superior Court of California County of San Diego, North Branch 325 South Melrose Dr. Vista, CA 92081	<u>Plaintiff's Counsel:</u> Jeremy S. Golden Cory M. Teed Golden & Cardona-Loya, LLP 3130 Bonita Road, Suite 200B Chula Vista, CA 91910 Phone: (619) 476-0030 Fax: (775) 989-5471 jeremy@goldencardona.com cory@goldencardona.com
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5. *Rehn v. Change Healthcare Inc.*, No. 24STLC08355 (Cal. Super. Ct. Los Angeles Cnty., filed November 15, 2024)

Status: The plaintiff in this case is represented by Golden & Cardona-Loya, LLP, the same law firm representing the plaintiffs in *Teed*, *Golden*, and *Fay* (described above) and the allegations and claims are nearly identical in all four cases. Unlike *Teed*, *Golden*, and *Fay*, *Rehn* was filed in Los Angeles County Superior Court rather than San Diego County Superior Court. Change Healthcare filed a motion to stay on December 17, 2024. Defendant Change Healthcare respectfully requests that the

MDL Court continue to communicate with the Honorable Mark Windham to coordinate this matter with the MDL proceedings.

<u>Judge:</u> Hon. Mark E. Windham Spring Street Courthouse 312 North Spring Street Los Angeles, CA 90012 Phone: (213) 310-7026	<u>Plaintiff's Counsel:</u> Cory M. Teed Jeremy S. Golden Golden & Cardona-Loya, LLP 3130 Bonita Road, Suite 200B Chula Vista, CA 91910 Phone: (619) 476-0030 Fax: (775) 989-5471 cory@goldencardona.com jeremy@goldencardona.com
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6. *Jeff M. Edwards v. Change Healthcare, Inc.*, No. 2SC-24-0708 (Tex. Williamson Just. Ct., Williamson Cnty., filed December 5, 2024)

Status: Change Healthcare was served with the complaint in this newly filed case on January 8, 2025. On January 21, 2024, Defendant Change Healthcare filed a general answer denying the allegations in the complaint. Change Healthcare respectfully requests that the MDL Court contact the Honorable Judge Angela Williams to coordinate this case with the MDL proceedings.

The plaintiff in this case, Jeff M. Edwards, is related to another plaintiff, Kim Edwards, who filed a nearly identical complaint in another case filed in the same court, Case No. 2SC-24-0600. Judge Williams recently ordered that Kim Edwards's case be stayed pending resolution of the MDL.

<u>Judge:</u> Hon. Angela Williams 350 Discovery Boulevard Suite 204 Cedar Park, TX 78613 Phone: (512) 260-4210	<u>Plaintiff:</u> Jeff M. Edwards (Pro se) 1406 Duster Cv Cedar Park, Texas 78613 Phone: (512) 300-7555 JeffEdwards777@gmail.com
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7. *Lincare Holdings Inc., et al. v. UHG, Inc.*, No. 210144594 (Fla. Circ. Ct. Hillsborough Cnty., filed Nov. 2, 2024)

Status: On December 6, 2024, Change Healthcare filed a motion to stay and plaintiffs filed a response on December 17, 2024. Defendants respectfully request that the MDL Court continue to communicate with the Honorable Judge Cheryl Thomas to coordinate this matter with the MDL proceedings.

<u>Judge:</u> Hon. Cheryl K. Thomas	<u>Plaintiffs' Counsel:</u> Gregory A. Fencik
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Edgecomb Courthouse 800 Twiggs Street, Room 525 Tampa, Florida 33602 Phone: (813) 272-6993 gencivdiva@fljud13.org	Donato, Brown, Pool & Moehlmann 3200 Southwest Freeway, Suite 2300 Houston, Texas 77027 Phone: (407) 310-8571 gfencik@donatobrown.com
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8. *Esparza v. Change Healthcare Solutions LLC*, No. 502024CA000189XXXAMB (Fla. Cir. Ct. Palm Beach Cnty., filed Jan. 10, 2025)

Status: Defendant Change Healthcare Solutions LLC was served with the complaint in this newly filed case on January 10, 2025. The parties agreed to an extension of Defendant's time to respond to the complaint until March 5, 2025. Defendant Change Healthcare Solutions LLC respectfully requests that the MDL Court contact the Honorable Judge Scott Kerner to coordinate this matter with the MDL proceedings.

<u>Judge:</u> Hon. Scott Kerner Judge Daniel T. K. Hurley Courthouse 205 North Dixie Hwy. West Palm Beach, FL 33401 Phone: (561) 355-1535 CAD-DivisionAN@pbcgov.org	<u>Plaintiff's Counsel:</u> Thomas Patti, Esq. Patti Zabaleta Law Group 110 SE 6th Street, Suite 1732 Fort Lauderdale, FL 33301 Phone: (561) 542-8550 Tom@pzlg.legal
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9. *Morris, et. al. v. Change Healthcare*, No. 2025-CA-000411-O (Fla. Cir. Ct. Orange Cnty., filed Jan. 17, 2025)

Status: Defendant Change Healthcare Solutions LLC was served with the complaint in this newly filed case on January 30, 2025 and a response is due on February 19, 2025. Defendant Change Healthcare respectfully requests that the MDL Court contact the Honorable Judge Eric J. Netcher to coordinate this matter with the MDL proceedings.

<u>Judge:</u> Hon. Eric J. Netcher Orange County Courthouse 425 N Orange Ave, Orlando, FL 32801 Phone: (407) 836-4576 40orange@ninthcircuit.org	<u>Plaintiff's Counsel:</u> Benjamin Morris (Pro Se) 15788 Avenue of the Arbors Winter Garden, FL 34787 Phone: (407) 815-5228 nebyenside@gmail.com
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10. *State of Nebraska, ex rel. Michael T. Hilgers, Attorney General v. Change Healthcare Inc., et al.*, No. D02CI240004356 (Neb. Distr. Ct. Lancaster Cnty., filed December 16, 2024)

Status: On December 16, 2024, this action was filed against Change Healthcare, UnitedHealth Group Incorporated, and Optum, Inc. Defendants' response to the complaint is currently due by February 28, 2025. Defendants respectfully request that the MDL Court continue to communicate with the Honorable Judge Susan Strong to coordinate this matter with the MDL proceedings.

<p><u>Judge:</u> Hon. Susan Strong 575 S 10th Street Lincoln, NE 68508 Phone: (402) 441-7301 Email: ClerkDistCt@lancaster.ne.gov</p>	<p><u>Plaintiff's Counsel:</u> Tyrone E. Fahie Beatrice O. Strnad Justin C. McCully Consumer Protection Bureau Office of the Attorney General 2115 State Capitol Lincoln, NE 68509-8920 Phone: (402) 471-2811 tyrone.fahie@nebraska.gov bebe.strnad@nebraska.gov justin.mccully@nebraska.gov</p> <p>William A. Burck Adam B. Wolfson Jennifer J. Barrett Derek L. Shaffer Sara C. Clark Ryan Swindall Quinn Emanuel Urquhart & Sullivan, LLP 865 S. Figueroa St., 10th Floor Los Angeles, California 90017 Phone: (213) 443-3000 williamburck@quinnemanuel.com adamwolfson@quinnemanuel.com jenniferbarrett@quinnemanuel.com derekshaffer@quinnemanuel.com saraclark@quinnemanuel.com ryanswindall@quinnemanuel.com</p>
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Sincerely,

/s/ Allison M. Ryan

Allison M. Ryan
Partner
allison.holt-ryan@hoganlovells.com
Phone: (202) 637-5600

cc: Daniel E. Gustafson (Plaintiffs Overall Lead Counsel)
Matthew Sill (Plaintiffs State Court/MDL Liaison Counsel)
David Hodge (Plaintiffs State Court/MDL Liaison Counsel)

Enclosures

Appendix A

LIST OF STATE COURT CASES

Below is a list of cases stemming from the February 2024 cyberattack on Change Healthcare pending in state courts of which the parties are currently aware. The cases are listed in alphabetical order by state.

Case Caption	Case No. and case type	Court	Judge	Status
Arizona				
<i>Blue Cross and Blue Shield of Arizona, Inc., et al. v. Change Healthcare Practice Management Solutions, Inc., et al.</i>	Case No. CV2025-001530 Not a class action.	Ariz. Super. Ct. Maricopa Cnty.	Hon. Christopher Whitten Southeast Regional Public Service Facility Courtroom 303 222 E Javelina Ave Mesa, AZ 85210 (602) 372-1164	Not yet served.
California				
<i>Fay v. Change Healthcare Inc., et al.</i>	No. 25CL000431N Not a class action.	Cal. Super. Ct. San Diego Cnty.	Hon. Michael D. Washington Superior Court of California, County of San Diego, North Branch 325 South Melrose Dr. Vista, CA 92081	Defendants' response to the complaint is due on February 21, 2025.
<i>Golden v. Change Healthcare</i>	No. 24CL015029C Not a class action.	Cal. Super. Ct. San Diego Cnty.	Hon. Judy S. Bae Central Civil Division, Hall of Justice 330 West Broadway, San Diego, CA 92101 (619) 450-7062	Motion to stay pending. Hearing on motion to stay set for February 14, 2025.
<i>Rehn v. Change Healthcare</i>	No. 24STLC08355 Not a class action.	Cal. Super. Ct. Los Angeles Cnty.	Hon. Mark E. Windham Spring Street Courthouse 312 North Spring St Los Angeles, CA 90012 (213) 310-7026	Motion to stay pending.
<i>Teed v. Change Healthcare</i>	No. 24CL015029C	Cal. Super. Ct. San Diego Cnty.	Hon. Judy S. Bae Central Civil Division, Hall of Justice	Motion to stay pending. Hearing on motion to stay set

	Not a class action.		330 West Broadway, San Diego, CA 92101 (619) 450-7062	for February 14, 2025.
Florida				
<i>Bawaney v. Change Healthcare, Inc.</i>	No. 502024 CC 011988 XXX AMB Not a class action.	Fla. Cnty. Ct. Palm Beach Cnty.	Hon. M. Katherine Mullinax Judge Daniel T.K. Hurley Courthouse 205 North Dixie Hwy. West Palm Beach, FL 33401 (561) 355-6158 CAD- DivisionRJ@pbcgov. org	Stayed pending resolution of the MDL.
<i>Enriquez v. Change Healthcare, Inc.</i>	No. 2024SC38950 -0 Not a class action.	Fla. Cnty. Ct. Orange Cnty.	Hon. Judge Adam K. McGinnis Orange County Court Building 425 North Orange Avenue, Suite 47 Orlando, FL 32802 (407) 836-2024 70orange@ocnjcc.or g	Dismissed.
<i>Esparza v. Change Healthcare Solutions, LLC</i>	No. 502024CA000 189XXXAMB Not a class action.	Fla. Cir. Ct. Palm Beach Cnty.	Hon. Scott Kerner Judge Daniel T. K. Hurley Courthouse 205 North Dixie Hwy. West Palm Beach, FL 33401 (561) 355-1535 CAD- DivisionAN@pbcgov .org	Defendant's response to the complaint is due March 5, 2025.
<i>Fullwood v. Change Healthcare, Inc.,</i>	No. 2024 CC 004047 CL Not a class action.	Fla. Cnty. Ct. Osceola Cnty.	Hon. Gabrielle Sanders-Morency Jon B. Morgan Osceola County Courthouse 2 Courthouse Square Kissimmee, FL 34741 (407) 742-2495	Stayed pending resolution of the MDL.

<i>Lincare Holdings Inc. v. UHG, Inc.</i>	No. 210144594 Not a class action.	Fla. Circ. Ct. Hillsborough Cnty.	Hon. Cheryl K. Thomas Edgecomb Courthouse 800 Twiggs Street, Room 525 Tampa, FL 33602 (813) 272-6993 gencivdiva@fljud13.org	Motion to stay pending.
<i>Morris, et al. v. Change Healthcare</i>	No. 2025-CA-000411-O Not a class action.	Fla. Cir. Ct. Orange Cnty.	Hon. Eric J. Netcher Orange County Courthouse 425 N Orange Ave, Orlando, FL 32801 (407) 836-4576 40orange@ninthcircuit.org	Defendant's response to the complaint is due on February 19, 2025.
Nebraska				
<i>Nebraska v. Change Healthcare, Inc., et al.</i>	No. D02CI240004356 Not a class action.	Neb. Distr. Ct. Lancaster Cnty.	Hon. Susan Strong 575 S 10th Street Lincoln, NE 68508 (402) 441-7301 ClerkDistCt@lancaster.ne.gov	Defendants' response to the complaint is due on February 28, 2025.
New Jersey				
<i>Mhrez v. Change Healthcare, Inc.</i>	No. BER-L-004772-24 Class action.	N.J. Super. Ct. Bergen Cnty.	Hon. Nicholas Ostuni Bergen County Justice Center 10 Main Street, Floor 4 Hackensack, NJ 07601 (201) 221-0700, ext. 25599	Not yet served.
Tennessee				
<i>Eye Care Associates of Morristown, Inc. v. Change Healthcare, Inc.</i>	No. 24-CV-048 Class action.	Tenn. Cir. Ct. Hamblen Cnty.	Hon. William E. Phillips, II 210 E Main Street Rogersville, TN 37857 (423) 272-7633	Stayed. Parties to jointly file a status update within 10 days of the MDL court issuing a scheduling order.
<i>Mid-South Imaging & Therapeutics, P.A. v.</i>	No. 24-0723-III Not a class action.	Tenn. Ch. Ct. Davidson Cnty.	Hon. I'Aesha L. Myles 1 Public Square, Suite 407	In discovery. Court ordered coordination with the MDL.

<i>UnitedHealth Group, Inc., et al.</i>			Nashville, TN 37201 (615) 862-5705	
<i>PruittHealth Inc. v. Change Healthcare Inc.</i>	No. 25C149 Not a class action.	Tenn. Cir. Ct. Davidson Cnty.	Hon. Lynne Tyler Ingram Metro Courthouse 1 Public Square Nashville, TN 37201 (615) 880-2591 Jud. Assistant: tammylrutledge@jis nashville.gov	Defendant's response to the complaint is due on February 18, 2025.
<i>Time for a Change Therapy, LLC v. Change Healthcare Inc.</i>	No. 25C151 Not a class action.	Tenn. Cir. Ct. Davidson Cnty.	Hon. Lynne Tyler Ingram Metro Courthouse 1 Public Square Nashville, TN 37201 (615) 880-2591 Jud. Assistant: tammylrutledge@jis nashville.gov	Defendant's response to the complaint is due on February 18, 2025.
<i>Total Wound Care of Oklahoma LLC, et al. v. Change Healthcare, Inc.</i>	No. 25C155 Not a class action.	Tenn. Cir. Ct. Davidson Cnty.	Hon. Lynne Tyler Ingram Metro Courthouse 1 Public Square Nashville, TN 37201 (615) 880-2591 Jud. Assistant: tammylrutledge@jis nashville.gov	Defendant's response to the complaint is due on February 20, 2025.
Texas				
<i>Jeff Edwards v. Change Healthcare, Inc.</i>	No. 2SC-24-0708 Not a class action.	Tex. Williamson Justice Ct., Williamson Cnty.	Hon. Angela Williams 350 Discovery Boulevard Suite 204 Cedar Park, TX 78613 (512) 260-4210	Answer and special exceptions filed on January 21, 2025.
<i>Kim Edwards v. Change Healthcare, Inc.</i>	No. 2SC-24-0600 Not a class action.	Tex. Williamson Justice Ct., Williamson Cnty.	Hon. Angela Williams 350 Discovery Boulevard Suite 204 Cedar Park, TX 78613 (512) 260-4210	Stayed pending resolution of the MDL.
Washington				

<i>Bollinger v. Washington State Department of Labor & Industries</i>	No. 24-2- 12761-5 SEA Class action.	Wash. Super. Ct. King Cnty.	Hon. Tanya L. Thorp c/o King County Superior Court 516 Third Avenue, Room C-203 Seattle, WA 98104 (206) 477-1489 thorp.court@kingcou nty.gov	Dismissed.
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